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**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BANK LEUMI USA,)) Case No.: 21-cv-02890
)	
Interpleader-Plaintiff,)	
)	
v.)	
)	
TRADE FINANCE TRUST, a Delaware)	ORDER TO SHOW CAUSE
Statutory Trust, IIG TRADE FINANCE, LLC,)	
in its capacity as the administrator of Trade)	
Finance Trust, IIG BANK (MALTA) LTD.,)	
GIROBANK INTERNATIONAL, N.V.,)	
GIROBANK, N.V., VALERIE P. MARIA, in)	
her capacity as the foreign representative of)	
IIG Trade Opportunities Fund Ltd.,)	
CHRISTOPHER KENNEDY, in his capacity)	
as a Joint Liquidator of IIG Global Trade)	
Finance Fund Ltd. and of IIG Structured Trade)	
Finance Fund, Ltd., ALEXANDER LAWSON,)	
in his capacity as a Joint Liquidator of IIG)	
Global Trade Finance Fund Ltd. and of IIG)	
Structured Trade Finance Fund Ltd., TRILINC)	
GLOBAL IMPACT FUND, LLC, TRILINC)	
GLOBAL IMPACT FUND – TRADE)	
FINANCE, LTD.,)	
)	
Defendants.)	
)	

Upon the Verified Complaint for Interpleader filed by Interpleader-Plaintiff Bank Leumi USA (“Bank Leumi” or the “Bank”), and the Declaration of Jordan D. Weinreich, Esq., dated April 5, 2021, hereto annexed, it is hereby

ORDERED, that the above named Defendants appear and show cause on _____, 2021 at _____ a.m./p.m. before the Honorable _____, U.S.D.J. of the United States District Court for the Southern District of New York, United States Courthouse, _____, Room _____, New York, New York 10007, why an Order should not be entered pursuant to 28 U.S.C. § 1335 and/or Rule 22 of the Federal Rules of Civil Procedure in favor of Bank Leumi, as follows:

- (1) Directing Bank Leumi to deposit the entirety of the funds maintained in Account No. xxxxxx5800, titled in the name of the “Trade Finance Trust – Redencao” (the TFT-Redencao Account”), minus any applicable charges, withholdings, costs and/or fees, as determined by the Court, in the Disputed Ownership Fund in the Court Registry Investment System;
- (2) Directing Bank Leumi to deposit the entirety of the funds maintained in Account No. xxxxxx4201, titled in the name of the “Trade Finance Trust – Nader Company S.A.” (the “TFT-Nader Account”), minus any applicable charges, withholdings, costs and/or fees, as determined by the Court, in the Disputed Ownership Fund in the Court Registry Investment System;
- (3) Directing Bank Leumi to deposit the entirety of the funds maintained in Account No. xxxxxx2801, titled in the name of the “Trade Finance Trust – Chakana LLC” (the “TFT-Chakana Account”), minus any applicable charges, withholdings, costs and/or fees, as determined by the Court, in the Disputed Ownership Fund in the Court Registry Investment System;

(4) Directing Bank Leumi to deposit the entirety of the funds maintained in Account No. xxxxxxx4100, titled in the name of the “Trade Finance Trust – Settlement Account” (the “TFT-Settlement Account”), minus any applicable charges, withholdings, costs and/or fees, as determined by the Court, in the Disputed Ownership Fund in the Court Registry Investment System;

(5) Dismissing with prejudice Bank Leumi from this Action and enjoining and restraining Defendants, as well as any other persons or entities that may assert any claims against Bank Leumi relating to the Account, from commencing or prosecuting any other action or proceeding against Bank Leumi to recover a portion or all of the assets in the TFT-Redencao Account, the TFT-Nader Account, the TFT-Chakana Account and/or the TFT-Settlement Account.

(6) Discharging Bank Leumi from all liabilities to Defendants arising out of the matters set forth herein upon payment of the entirety of funds maintained in the TFT-Redencao Account, the TFT-Nader Account, the TFT-Chakana Account and the TFT-Settlement Account, minus any applicable charges, commissions, withholdings, costs and/or fees, into Court;

(7) Authorizing payment from the funds deposited in the Disputed Ownership Fund in the Court Registry Investment System to Bank Leumi for its counsel fees and costs incurred in connection with this Action;

(8) Granting Bank Leumi such other and further relief as the Court deems just and equitable; and it is further

ORDERED that service of this Order and the Verified Complaint, together with any and all other supporting papers, shall be served on Defendants by email within _____ days of the date hereof; and it is further

ORDERED that papers in response to this application, if any, by Defendants shall be served and filed with this Court no later than 5:00 p.m. on the _____ day of _____ 2021, and that Bank Leumi's reply papers, if any, shall be served and filed no later than 5:00 p.m. on the _____ day of _____ 2021.

Dated: New York, New York

April ____, 2021

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, U.S.D.J.